1 2 3 4	ERIC GRANT United States Attorney KEVIN C. KHASIGIAN Assistant U. S. Attorney 501 I Street, Suite 10-100 Sacramento, CA 95814 Telephone: (916) 554-2700	
5	Attorneys for the United States	
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8	IN THE UNITED STATES DISTRICT COURT	
9	EASTERN DISTRICT OF CALIFORNIA	
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11	UNITED STATES OF AMERICA,	2:24-MC-00402-DJC-SCR
12	Plaintiff,	CENTRAL A ELONA AND ORDER ENTENDRAC
13	v.	STIPULATION AND ORDER EXTENDING TIME FOR FILING A COMPLAINT FOR
14	APPROXIMATELY \$269,565.50 SEIZED FROM	FORFEITURE AND/OR TO OBTAIN AN INDICTMENT ALLEGING FORFEITURE
15	FIRST RELIANCE BANCSHARES, INC. ACCOUNT NUMBER 5220000969, HELD IN THE NAME OF LIFESTYLE DEVELOPMENT, LLC,	
16 17 18	APPROXIMATELY \$1,373.95 SEIZED FROM VALLEY NATIONAL BANK ACCOUNT NUMBER 8843534202, HELD IN THE NAME OF LIFESTYLE DEVELOPMENT, LLC,	
19 20	APPROXIMATELY \$7,982.56 SEIZED FROM FIRST RELIANCE BANCSHARES, INC. ACCOUNT NUMBER 5210000745, HELD IN THE NAME OF THOMAS EIDE,	
21	APPROXIMATELY \$50,000.00 SEIZED FROM	
22	MAINSTREET BANK ACCOUNT NUMBER 2010039009, HELD IN THE NAME OF PRV	
23	INTERNATIONAL, LLC,	
24	APPROXIMATELY \$36,650.38 SEIZED FROM BANK OF AMERICA, N.A. ACCOUNT NUMBER	
25	383019458700, HELD IN THE NAME OF VITAKEM NUTRA, AND	
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APPROXIMATELY \$37,886.31 SEIZED FROM SOUTHSTATE BANK, NA ACCOUNT NUMBER 8010002012630, HELD IN THE NAME OF SARAH NICK,

Defendants.

It is hereby stipulated by and between the United States of America and potential claimants. Thomas Eide on behalf of himself and Lifestyle Development, LLC, by and through their respective counsel, and Erick Reyes-Villa as representative for PRV International, LLC ("claimants"), as follows:

- 1. On or about May 7, 2024, the U.S. Postal Inspection Service ("USPIS") seized the above-referenced defendant funds pursuant to Federal seizure warrants (hereafter collectively "defendant funds").
- 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required to send notice to potential claimants, file a complaint for forfeiture against the defendant funds, or obtain an indictment alleging that the defendant funds are subject to forfeiture within one hundred and fifty days of seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That deadline was October 4, 2024.
- 3. By Stipulation and Order filed October 9, 2024, the parties stipulated to extend to January 2, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.
- 4. By Stipulation and Order filed January 6, 2025, the parties stipulated to extend to April 2, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.
- 5. By Stipulation and Order filed April 7, 2025, the parties stipulated to extend to July 1, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.
- 6. By Stipulation and Order filed July 1, 2025, the parties stipulated to extend to September 29, 2025, the time in which the United States is required to file a civil complaint for forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

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1	7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to	
2	December 29, 2025, the time in which the United States is required to file a civil complaint for forfeiture	
3	against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to	
4	forfeiture.	
5	8. Accordingly, the parties agree that the deadline by which the United States shall be	
6	required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment	
7	alleging that the defendant funds are subject to forfeiture shall be extended to December 29, 2025.	
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9	Dated: <u>9/29/2025</u>	ERIC GRANT United States Attorney
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11	By	KEVIN C. KHASIGIAN
12		Assistant U.S. Attorney
13	D . 1 0/20/2025	//D :101
14 15	Dated: <u>9/29/2025</u>	/s/ Daniel Olmos DANIEL OLMOS
16		Attorney for potential claimant Thomas Eide on behalf of himself and Lifestyle Development, LLC
17		600 University Avenue Palo Alto, CA 94301 (Signature authorized by email)
18		
19	Dated: <u>9/25/2025</u>	/s/ Erick Reyes-Villa
20		ERICK REYES-VILLA Potential Claimant on behalf of
21		PRV International, LLC Appearing in propria persona
22		1055 Thomas Jefferson Street NW, Suite 620 Washington, DC 20007
23		(Signature authorized by email)
24	IT IS SO ORDERED.	
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26	Dated: September 30, 2025	/s/ Daniel J. Calabretta
27		THE HONORABLE DANIEL J. CALABRETTA UNITED STATES DISTRICT JUDGE
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